MOTION FILED
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No. 90-1104

IN THE

Supreme Court of the United States

OCTOBER TERM, 1990

N.A.A.C.P., DETROIT BRANCH; THE GUARDIANS, INC. BRADY BRUENTON; CYNTHIA MARTIN; HILTON NAPOLEON; SHARRON RANDOLPH; BETTY T. ROLLAND; GRANT BATTLE; CYNTHIA CHEATOM; EVIN FOBBS; JOHN H. HAWKINS; HELEN POELNITZ, on behalf of themselves and all others similarly situated,

Petitioners,

v.

DETROIT POLICE OFFICERS ASSOCIATION (DPOA); DAVID WATROBA, *President;* CITY OF DETROIT; COLEMAN A. YOUNG, *Mayor;* DETROIT POLICE DEPT.; BOARD OF POLICE COMMISSIONERS; WILLIAM HART, *Chief,*

Respondents.

MOTION FOR LEAVE TO FILE AND BRIEF OF *AMICI* SOCIETY OF AMERICAN LAW TEACHERS, CENTER FOR CONSTITUTIONAL RIGHTS, NATIONAL CONFERENCE OF BLACK LAWYERS, AND NATIONAL LAWYERS GUILD IN SUPPORT OF THE PETITIONERS' PETITION FOR WRIT OF CERTIORARI

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Amici, the Society of American Law Teachers, the Center for Constitutional Rights, the National Conference of Black Lawyers, and the National Lawyers Guild, move this Court pursuant to Supreme Court Rule 37 to allow them to file the attached brief.

This Motion is necessary because Detroit Police Officers Association Respondents did not consent to this brief, even though the City Respondents verbally gave their consent.

Amici have an interest in the issues raised in this Petition for Writ of Certiorari and have stated those interests clearly in their Statement of Interest. *Amici* believe the arguments advanced in the brief will assist the Court in considering the broader impact of the Sixth Circuit ruling that is appealed.

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TABLE OF CONTENTS

Page

MOTION 1

TABLE OF CONTENTS i

TABLE OF AUTHORITIES ii

STATEMENTS OF INTEREST 1

TABLE OF AUTHORITIIES

Cases: Page

Alexander v. Holmes,
396 U.S. 19 (1969).....11

Baker v. City of Detroit,
483 F. Supp. 930 (E.D. Mich. 1979).....5

Baker v. City of Detroit,
483 F. Supp. 930 (E.D. Mich. 1979)
Aff'd Bratton v. City of Detroit,
704 F.2d 878 (6th Cir. 1983).....5, 8

Brown v. Board of Education, (II)
39 U.S. 294 (1955).....11

City of Richmond v. J.A. Croson Co.,
__ U.S. __ 109 S.Ct. 706 (1989).....5

Columbus Board of Education v. Pennick,
433 U.S. at 459, 99 S.Ct. at 2947.....5, 9, 10

Cooper v. Aaron,
358 U.S. 1 (1958).....11

Dayton Board of Education v. Brinkman,
443 U.S. 526, 538, 99 S.Ct. 2971
61 L.Ed.2d 720 (1979).....5, 10

Green v. County School Board,
381 U.S. 1689 (1967).....5, 9

Jago v. Johnston,
691 F.2d 283 (6th Cir. 1982).....4

Johnson v. Transportation Agency,
480 U.S. 616 (1987).....5

Page

Keyes v. School District No. 1,
413, U.S. 289, 200 n.11, 93 S.Ct. 2686,
n.11, 37 L.Ed.2d 548 (1973).....9, 10

Loving v. Virginia,
388 US 1, 87 S.Ct. 1817
18 L.Ed.2d 1010 (1967).....8

Missouri v. Jenkins,
__ U.S. __, 110 S.Ct. 1659 (1990).....5, 11

NAACP v. DPOA,
900 F.2d 903 (6th Cir. 1990).....9, 10

Nadeau v. Helgemoe,
691 F.2d 283 (6th Cir. 1982).....4

Paradise v. United States,
480 U.S. at 149 (1987).....5

Personnel Administrator of Massachusetts v. Feeney,
442 U.S. at 256, 272, 99 S.Ct. 2282,
60 L.Ed.2d 870 (1979).....9

Swann v. Charlotte Mecklenberg,
402 U.S. 1 (1971).....5, 9, 11

United Steel Workers v. Weber,
443 U.S. 193 (1979).....5

University of California Regents v. Bakke,
438 U.S. 265 (1978).....5

Wygant v. Jackson Board of Education,
476 U.S. 267 (1987).....5

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STATEMENTS OF INTEREST

SOCIETY OF AMERICAN LAW TEACHERS

The SOCIETY OF AMERICAN LAW TEACHERS (SALT) is a national organization of more than 500 legal educators at over 100 law schools. SALT is committed to promoting public service by the legal profession and to advancing justice and protecting human rights. SALT also has advocated affirmative

action to diversify law school student bodies and faculties. As law teachers, the members of SALT are especially sensitive to the effectuation of constitutional rights and knowing that attorney's who take on important constitutional litigation are compensated if they obtain some of the relief they sought. The rights of all Americans are diminished when the constitutional rights of some Americans remain unvindicated. This is especially true when the violation has occurred by a public entity. SALT believes that the Court of Appeals misperceived the scope of the constitutional violation involved in this case and applicable law on attorney fees and failed to insure that it was eliminated root and branch. For this reason, we urge the Court to act favorably on Petitioners' requests.

CENTER FOR CONSTITUTIONAL RIGHTS

The CENTER FOR CONSTITUTIONAL RIGHTS (CCR) was born of the civil rights movement and the struggles of Black people in the United States for true equality. CCR attorneys have been active in cases involving voting rights, jury composition, community control of schools, fair housing, and employment discrimination. Through litigation and public education, they have worked to protect and make meaningful the constitutional and statutory rights of women, Blacks, Puerto Ricans, Native Americans, and Chicanos. In this case CCR believes the Sixth Circuit's rulings on liability and fees allow the public employer to be excused from the consequences of its egregious intentional racial discrimination. CCR supports itself in part from attorney fee awards in cases where fees are allowed. CCR, therefore, has an interest in seeing to it that fees are awarded when attorneys succeed in getting relief for their clients.

NATIONAL CONFERENCE OF BLACK LAWYERS

The NATIONAL CONFERENCE OF BLACK LAWYERS (NCBL) is a nonprofit organization of more than 700 lawyers throughout the United States, Canada and the Virgin Islands and 2500 law students through the Black American Law Students Association. NCBL seeks to assure the fair and equitable administration of justice. The NCBL is engaged in both affirmative litigation to correct racial injustices and the criminal defense of individuals who are prosecuted either because of their race or their political beliefs. Many NCBL members depend on court awarded attorney fees for their livelihoods. NCBL shares the concerns of other *Amici* that the Sixth Circuit's opinions represent major and unfortunate departures from prior Supreme Court decisions.

THE NATIONAL LAWYERS GUILD

The NATIONAL LAWYERS GUILD (NLG) is a national organization of over 10,000 lawyers, legal workers, law students and "jailhouse lawyers" in over 200 chapters throughout the United States. Since its founding in 1937, the Guild has provided legal support to virtually every progressive movement in this country for racial, economic, social and political justice. As the first racially integrated bar association, the NLG has been particularly active in litigation designed to overcome this country's legacy of slavery. The intentional discrimination Petitioners' sought to address in the underlying case, and the fees they seek for prevailing in obtaining the relief, are matters that greatly affect the NLG's membership.

ARGUMENT

Petitioners, NAACP, et al., have petitioned this Court for a Writ of Certiorari seeking review of the Sixth Circuit Court

of Appeals' September 27, 1990 decision denying them prevailing party status for purposes of awarding attorney fees and costs. *Amici* submit this brief in support of Petitioners' Petition and urge this Court to issue the Writ of Certiorari.

Petitioners succeeded through this litigation in obtaining the recall of over 800 laid off police officers. These officers were recalled with full back seniority and pay commensurate with that seniority even though, under the collective bargaining agreement between the Police Union and the City, the time limits requiring the City to recall them at all had expired. These officers still have their full seniority and pay. It would be anomalous to deny Petitioners' request for fees and costs after they achieved such success.

It would further be anomalous if the Sixth Circuit could hold that Petitioners made out "colorable claims against the union under §1981 and against the City and City officials under §1983 (A-195) and still find Plaintiffs not catalysts for the results they achieved for the class.[1] There is no question that, as a result of Petitioners' efforts, the legal relationship between the Class and City of Detroit was changed to their benefit.

Amici agree with Petitioners that the relationship between the Fee Opinion and the underlying liability opinion are so interrelated that the Petitioners request for rehearing should be granted as well. Petitioners, who have spent over ten years in litigation obtaining and preserving major benefits for the class, have been handed a Sixth Circuit opinion which leaves their attorneys virtually uncompensated and with costs that are due and owing. *Amici* urge this Court to *grant* certiorari and to look favorably on Petitioners request for rehearing. The

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[1]Under *Jago v. Johnston* 691 F.2d 283 (6th Cir. 1982) and *Nadeau v. Helgemoe* 581 F.2d 275 (1st Cir. 1978). Petitioners claim must only meet a "not frivolous, unreasonable or groundless" standard or provide some basis in law for the relief.

issues at stake are too fundamental to our law not to resolve them.

Amici are aware that this Court in numerous cases has expounded upon the limits and parameters of voluntary race-conscious remedial efforts by private and public entities. *See, e.g. University of California Regents v. Bakke* 438 U.S. 265 (1978); *United Steel Workers v. Weber* 443 U.S. 193 (1979); *Johnson v. Transportation Agency* 480 U.S. 616 (1987); *City of Richmond v. J.A. Croson Co.*, _____ U.S._____, 109 S.Ct. 706 (1989); *Wygant v. Jackson Board of Education* 476 U.S. 267 (1987). This Court has consistently distinguished these cases from cases where the municipality has been adjudicated to be guilty of invidious racial discrimination in its governmental actions, (*e.g.*, school segregation, employment discrimination and housing segregation).

Municipalities adjudicated to have engaged in intentional discrimination come under affirmative obligations to eradicate the effects of that discrimination root and branch. *See, e.g., Green v. County School Board,* 381 U.S. 1689 (1967); *Swann v. Charlotte Mecklenburg,* 402 U.S. 1 (1971) *Dayton Board of Education v. Brinkman,* 443 U.S. 526, 538, 99 S.Ct. 2971, 61 L.Ed.2d 720 (1979), *Columbus Board of Education v. Penick,* 433 U.S. at 459, 99 S.Ct. at 2947, and more recently, *Paradise v. United States,* 480 U.S. 149 (1987) and *Missouri v. Jenkins,* _____ U.S._____, 110 S. Ct. 1659 (1990).

The Sixth Circuit's decision appears to abandon those duties by ignoring, and thus trying to will out of existence the underlying factual predicate for this case.

This factual predicate is found in *Baker v. City of Detroit,* 483 F. Supp. 930 (E.D. Mich 1979). In *Baker v. City of Detroit, supra, aff'd Bratton v. City of Detroit,* 704 F.2d 878 (6th Cir. 1983), District Court Judge Keith found the City of Detroit and its Police Department guilty of intentional discrimination

against blacks in recruitment, employment and deployment of police officers.

He described the history of past discrimination in the Detroit Police Department in over thirty-nine pages of findings. He called it a "sad and sorry history." *Id.* at 940. He began with the 1943 race riot in Detroit and quoted from a part of the report of the riot written by NAACP Executive Secretary Walter White and the now Supreme Court Justice Thurgood Marshall, wherein it was said: "The trouble reached riot proportions because the police of Detroit enforced the law under an unequal hand." *Id.* at 966. Judge Keith, *inter alia*, found that from 1944 to 1953, 3,005 whites and 117 blacks were hired in the department. This resulted in a virtually all white police force. The supervisory ranks were virtually barren of blacks. The few blacks that were hired were strictly segregated. They were limited in their patrol assignments to certain areas and had to walk a beat until a vacancy in a "black" scout car opened up. A white officer's consent had to be obtained before he could be assigned to ride with a black officer. Blacks were used to do undercover work only in black areas. *Id.* at 941-943. Judge Keith described the department's employment practices from 1954 through 1960 as remaining the same as they were between 1943 and 1954.

By 1960 only three percent of the force was black (as compared with the Wayne County Sheriff's Department[2] which was thirty percent black). Id. at 942.

The first attempt to desegregate scout cars in 1959 was met with strong opposition by white officers. From 1960 through 1967 change was very slow. Between 1961 and 1966, 1,080 whites and 86 blacks were hired. The number of blacks in command ranks was "truly minuscule." Judge Keith found that a key reason why the police department in 1967 was so

[2]The City of Detroit comprises a large portion of Wayne County both in area and population.

overwhelmingly white[3] was that the hiring process had been "riddled with discrimination for years." *Id.* at 942-947.

Judge Keith also recounted the 1967-1974 employment practices in both hiring and promotions. *Id.* 948-958. The City's evidence, presented through the City's own expert testimony of Alan Fechter confirmed the existence of discrimination in both hiring and promotion. *Id.* at 958-965.

Judge Keith, at various times in his Opinion, commented on the deleterious impact the discriminatory practices of the department had on the community and police-community relations. He described how the department was justifiably regarded as an "occupation army" in the black community. The role of the police in the riots of 1943, 1967 and incidents thereafter showed the friction between the black community and the police to have been a trigger for these outbreaks. *Id.* at 996.

All of the evidence chronicled by Judge Keith from Pages 940 to 979 led him to conclude and find that, "*In this case the evidence shows intentional discrimination against blacks through at least 1967-1968 when the Detroit riot caused people to sit up and take notice.*" *Id.* at 992. (emphasis added)

These findings, made in the context of a challenge to an affirmative action plan in the promotion process, were issued October 1, 1979. The City knew of these findings and had argued in *Baker* that this evidence imposed an affirmative duty on the City to affirmatively promote its black officers as part of its remedial efforts. On October 12, 1979, the City of Detroit laid off the first 400 of 1,100 police officers that were laid off between October 1979 and September 1980. Of the 1,100 police officers that were laid off, 800 were black.

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[3]The Police Department was ninety-four percent white compared to six percent black when approximately thirty-five percent of the available workforce was non-white.

Black officers in the Detroit Police Department in 1978 were 39 percent of the force when the City's own experts said 46.6 percent of the force would have been black absent discrimination. After the layoffs, black officers comprised only 26 percent of the force.

District Court Judge Gilmore applied the doctrine of collateral estoppel to prevent the relitigation of the *Baker* findings in the instant case which challenged the layoff of these 1,100 officers. Judge Gilmore determined that all laid off officers should be recalled with full seniority holding:

> *Bratton* and *Baker* found that, at least until 1968, the City of Detroit 'employed a consistent overt policy of intentional discrimination against blacks in all phases of its operations'. *Bratton, supra* at 888.
>
> Since the *Baker-Bratton* decisions were in the context of suits by white officers challenging the City's voluntary affirmative action plan, neither Judge Keith nor the Sixth Circuit had to reach the obvious corollary of these findings — that this consistent policy of intentional discrimination was in violation of the Fourteenth Amendment, which prohibits all invidious racial discrimination. *See Loving v. Virginia*, 388 U.S. 1, 87 S.Ct. 1817, 18 L.Ed.2d 1010 (1967). The record in *Baker* is 'replete with evidence', *Bratton, supra*, at 888, of invidious racial discrimination against blacks in the Detroit Police Department prior to 1968.

The District Court further found:

> Based on these judicial findings of past discrimination it is clear the City had an affirmative obligation to eliminate the continuing effects of past racial discrimination and to eliminate all racial discrimina-

tion 'root and branch.'' *Green v. County School Board*, 391 U.S. 430, 438, 88 S.Ct. 1689, 1694, 20 L.Ed.2d 716 (1967). *See also Swann v. Charlotte-Mecklenburg*, 402 U.S. 1, 14, 91 S.Ct. 1267, 1275, 28 L.Ed.2d 554 (1971); *Keyes v. School District No. 1*, 413, U.S. 289, 200 n. 11, 93 S.Ct. 2686, 2693 n. 11, 37 L.Ed.2d 548 (1973). The City had notice of all of these judicial findings as of October 1, 1979 when Judge Keith's opinion in *Baker* was issued.

NAACP v. DPOA, *supra* at 1200 (A.13 of Pet. for Cert. 90-569)

* * *

The City objects to the finding of intentional discrimination at the time the City began its layoffs in 1979, and attempts to attach particular significance to general definitions of intent in the racial discrimination field, which hold that foreseeable results and discriminatory impact, *without more*, do not establish discriminatory purpose. *See e.g. Columbus Board of Education v. Penick*, 443 U.S. 449, 464, 99 S.Ct. 2941, 2950, 61 L.Ed.2d 666 (1979), *Personnel Administrator of Massachusetts v. Feeney*, 42 U.S. 256, 272, 99 S.Ct. 2282, 2292, 60 L.Ed.2d 870 (1979). This is not the situation here. Here we have the 'more'—the judicial findings of past intentional discrimination made by Judge Keith in *Baker*, and affirmed by the Sixth Circuit in *Bratton*.

Given this past finding of intentional discrimination, the City becomes liable every time it knowingly and foreseeably breaches its affirmative obligations to remedy this discrimination. The remoteness in time

> from the original act of intentional discrimination does not make later acts any less intentional. *Keyes, supra.* 'Each instance of a failure or refusal to fulfill this affirmative duty continues the violation of the Fourteenth Amendment.' *Columbus Board of Education v. Penick, supra* 433 U.S. at 459, 99 S.Ct. at 2947. Thus, the City's discussion of the particular intent of the City in 1979-80 is largely irrelevant. '[T]he measure of the post *Brown* I conduct of the school board under an unsatisfied duty to liquidate a dual system is the effectiveness, not the purpose, of the actions in decreasing or increasing the segregation caused by the dual system.' (Citations omitted). *Dayton Board of Education v. Brinkman*, 443 U.S. 526, 538, 99 S.Ct. 2971, 2979, 61 L.Ed.2d 720 (1979)."
>
> *NAACP v. DPOA, supra* at 1201,1202
> (A.17 of Pet. for Cert. 90-569)

There are no logical or legal flaws in this reasoning. The Sixth Circuit never identified any. On the first appeal, *NAACP v. DPOA*, 821 F.2d 328 (6th Cir. 1987), the Sixth Circuit mischaracterized the nature of the *Baker* findings and appeared concerned that the findings of intentional discrimination made by Judge Keith in *Baker* and which the Circuit affirmed, should have any legal consequences beyond providing the support for the affirmative promotion plan. But there *are* legal consequences to such findings and the response should not have been to *deny* their existence.

On the second appeal, the Sixth Circuit again failed to acknowledge the force and logic of Judge Gilmore's opinion. Instead, Petitioners were told they had no cause of action because the City's actions did not violate a provision of Title VII, even though no Title VII claim was ever before the court in this case. *NAACP v. DPOA*, 900 F.2d 903 (6th Cir. 1990)

It is not hyperbole to say that the effect of the Sixth Circuit decision is to write the Constitution out of existence, for if Petitioners do not have a cause of action to enforce *constitutional rights* based on a conclusion that the City's police layoffs by seniority did not violate Title VII, the Court really is saying that there are no constitutional rights, only substantive statutory rights. By erroneously dismissing Petitioners' claims, the Sixth Circuit's September 27, 1990 opinion also improperly denied prevailing status to Petitioners and hold them ineligible to be awarded fees and costs.

At issue and at stake are the continued vitality of this Court's rulings beginning with *Brown v. Board of Education (II)*, 39 U.S. 294 (1955) that the State has an affirmative and constitutionally based obligation to dismantle state-sanctioned and imposed intentional, *de jure*, racial discrimination and its effects. This Court has instructed the nation in an unbroken line of cases from *Brown* to *Paradise*, and most recently in *Missouri v. Jenkins, supra* that this affirmative duty is in existence until all vestigial effects of the intentional discrimination or segregation are purged. This Court has held that the duty to dismantle the effects of state imposed and sanctioned intentional racial discrimination and segregation is continuing and must proceed, regardless of the popularity or unpopularity of the relief ordered. *Alexander v. Holmes*, 396 U.S. 19 (1969); *Cooper v. Aaron*, 358 U.S. 1 (1958); *Swann v. Charlotte-Mecklenburg School Board, supra* (1971). Budgetary excuses cannot be raised to shield a failure to comply with constitutional duties. *Missouri v. Jenkins, supra.*

Amici urge this Court not to abandon these principles which a denial of certiorari in the underlying case would signal. As noted above, the interests of *Amici* are directly impacted by the Sixth Circuit's decisions in the fee and liability cases. *Amici* devote a considerable portion of their litigation activities to combatting discrimination in the public and private sectors.

The Sixth Circuit's rulings impede the ability of *Amici* to vindicate the constitutional rights of those we represent.

Respectfully submitted,

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